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Attorneys for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PETER LASELL,

Defendants.

No. *CR07-0716 MHP*

UNITED STATES' APPLICATION TO
SEAL INDICTMENT AND [PROPOSED]
ORDER

The government hereby moves the Court for an order sealing the indictment, this motion, and the Court's sealing order until further order of the Court. The United States is concerned of the risk to officer safety if Lasell learns of the indictment in this matter before he is arrested and brought before the Court for his initial appearance. Should the Court grant this motion, the government intends to ask the Court to

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SEALING APPLICATION AND PROPOSED ORDER
UNITED STATES v. LASELL

FILED

NOV 13 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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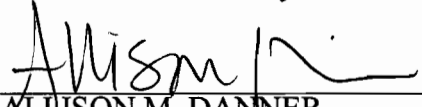
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1 unseal the indictment at Lasell's initial appearance. The United States requests that this Court
2 order the Clerk of the Court to furnish copies of the arrest warrant to the United States Attorney's
3 Office and to Special Agents of Immigration and Customs Enforcement. The United States also
4 requests copies of the sealed Indictment and this Application and Order.

5 DATED: November 13, 2007

Respectfully submitted,


6 SCOTT N. SCHOOLS
7 United States Attorney

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9 ALLISON M. DANNER
10 Assistant United States Attorney

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13 **[PROPOSED] ORDER**

14 Based upon the motion of the government and for good cause shown, IT IS HEREBY
15 ORDERED that the indictment, this motion, this sealing order, and all related papers shall be
16 sealed until further order of the Court. The Clerk of the Court is ordered to furnish copies of the
17 Indictment and arrest warrant in this matter to the United States Attorney's Office and to Special
18 Agents of Immigration and Customs Enforcement. The Clerk of the Court is also ordered to
19 furnish copies of the United States' Sealing Application and this Sealing Order to the United
20 States Marshals Service, Special Agents of Immigration and Customs Enforcement, and the U.S.
21 Attorney's Office..

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23 DATED: November 13, 2007

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25 BERNARD ZIMMERMAN
26 United States Magistrate Judge
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